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United States of America
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8 IN THE UNITED STATES DISTRICT COURT
9 EASTERN DISTRICT OF CALIFORNIA
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11 UNITED STATES OF AMERICA,
12 Plaintiff,
13 v.
14 FRANK JONATHAN GUZMAN, and
JOSE CRUZ IVAN AISPURO,
15 Defendants.
16

CASE NO. 2:19-CR-0232-JAM

STIPULATION AND ORDER TO CONTINUE
STATUS CONFERENCE

Date: February 25, 2020
Time: 9:15 a.m.
Judge: Hon. John A. Mendez

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18 Plaintiff United States of America, through its undersigned counsel, and defendants Frank
19 Jonathan Guzman and Jose Cruz Ivan Aispuro, through their respective counsel of record, stipulate that
20 the status conference currently set for February 25, 2020, be continued to April 14, 2020, at 9:15 a.m.

21 On December 19, 2019, both defendants were arraigned on the seven-count Indictment. (Dkt.
22 Nos. 16, 19.) Since that time, the United States has produced to the defense discovery that includes over
23 200 pages of reports and memoranda, over 600 photos, and dozens of audio, video, and multimedia files
24 from throughout this investigation. Both defense counsel require additional time to review these
25 materials, time to confer with their clients, time to conduct further research and investigation about the
26 charged offenses, and time to otherwise prepare for trial. In addition, defense counsel require additional
27 time to review the potential implications of the First Step Act and to discuss the matter with their clients.

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1 Based on the foregoing, the parties stipulate that the status conference currently set for February
2 25, 2020, be continued to April 14, 2020, at 9:15 a.m. The parties further agree that time under the
3 Speedy Trial Act should be excluded from the date the date of this filing to and including April 14, 2020,
4 under 18 U.S.C. § 3161(h)(7)(A) and (B)(iv) [reasonable time to prepare] and General Order 479, Local
5 Code T4, based on continuity of counsel and defense preparation.

6 Counsel and the defendants also agree that the ends of justice served by the Court granting the
7 requested continuance outweigh the best interests of the public and the defendants in a speedy trial.

8 Respectfully submitted,

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10 Dated: February 20, 2020

/s/ Timothy H. Delgado
TIMOTHY H. DELGADO
Assistant United States Attorney
Attorney for plaintiff United States

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14 Dated: February 20, 2020

/s/ THD for Kelly Babineau
KELLY BABINEAU
The Law Office of Kelly Babineau, APC
Attorney for defendant Frank J. Guzman

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17 Dated: February 20, 2020

/s/ THD for David W. Dratman
DAVID W. DRATMAN
Attorney at Law
Attorney for defendant Jose Cruz Ivan Aispuro

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The Court orders that the time from the date the parties stipulated, to and including April 14, 2020, shall be excluded from computation of time within which the trial in this case must be commenced under the Speedy Trial Act, pursuant to 18 U.S.C. § 3161(h)(7)(A) and (B)(iv) [reasonable time for counsel to prepare] and General Order 479 (Local Code T4). It is further ordered that the February 25, 2020 status conference be continued until April 14, 2020, at 9:15 a.m.

/s/ John A. Mendez
Hon. John A. Mendez
United States District Court Judge